

1 WorldCom Witness Caputo, at 10-11. WorldCom Witness Caputo describes
2 WorldCom's "needs" in great detail:

3 WorldCom requires Verizon to route WorldCom's OS/DA traffic,
4 using switch software features, to existing shared access, Feature
5 Group D trunks on WorldCom's Long Distance Network.
6 Verizon's switch will translate each WorldCom customer's 411 or
7 555-1212 call into a new 10-digit number that Verizon will route
8 like any other long distance call it sends to WorldCom's long
9 distance, FGD trunks. Similar methods will be used to translate
10 WorldCom's customers 0+ and 0- calls and route them to
11 WorldCom's long distance network. Verizon will perform the
12 switching functions and translations necessary to support this
13 routing. Verizon will then send these WorldCom calls, along with
14 all other WorldCom long distance calls (customer-originated 1+
15 calls where the WorldCom customer is PIC'd to WorldCom) to
16 WorldCom's existing FGD trunks. The switch will read the new
17 10-digit number as a 1+ call that goes to WorldCom as the
18 customer's PIC'd long distance carrier, and will send it to
19 WorldCom's appropriate FGD trunk group. This is a very efficient
20 method of routing for WorldCom, which has established FGD
21 trunk groups currently sending Long Distance traffic from
22 Verizon's local switches.

23 *Id.* at 13. According to WorldCom Witness Caputo, WorldCom's testing of this
24 customized routing "prove[s] conclusively" that it "is technically feasible to perform
25 customized routing using FGD signaling with the necessary translations." *Id.* at 14.

26 **Q. IN VERIZON VA SERVICE TERRITORIES, WILL VERIZON VA PROVIDE**
27 **CUSTOMIZED ROUTING TO WORLDCOM'S FG-D TRUNKS IN THE**
28 **MANNER IN WHICH WORLDCOM PROPOSES?**

29 A. Yes. Verizon VA offers customized routing of OS/DA, including FG-D protocol.

1 As outlined in Verizon VA's responses to WorldCom Data Requests 1-28, 6-110 and 6-
2 114, Verizon provides UNE-based CLECs OS/DA customized routing via the industry
3 standard Feature Group-C (FG-C) with Modified Operator Services Signaling (MOSS).
4 MOSS trunks are also used by switch based CLECs to deliver their customers' calls to
5 Verizon for OS/DA processing. Verizon also uses this same industry standard service
6 architecture to route its own end users' OS/DA calls from each end office to its OS/DA
7 platforms.

8 In Virginia, Verizon VA is also able to offer an additional method for the customized
9 routing of OS/DA calls because Verizon VA has special Advanced Intelligent Network
10 (AIN) capabilities that enable routing via FG-D trunks. Routing OS/DA calls via FG-D
11 trunks is not the industry standard and does not support all call control features that are
12 associated with the full provision of OS/DA services, several of which are used in
13 emergency situations. Most specifically, operator ringback and call control features are
14 not available with FG-D protocol. With AIN, Signaling System 7 ("SS7") is used as the
15 communication network for service controlling computers called Integrated Service
16 Control Points (ISCPs™), a product developed by Bellcore. ISCPs™ provide the ability
17 for the calling party's switch to interrupt call processing and request instructions from the
18 ISCP™ for further routing instructions. A switch incorporating this call interruption
19 feature is called a Service Switching Point ("SSP").

20 Implementation and provisioning of this AIN service involves three major functions. The
21 first function is the provisioning of CLEC network facilities at the end office SSPs from
22 which the CLEC end-users will be provided service. The second function is the

1 provisioning of the CLEC routing options in the ISCP™ database. The third function
2 involves the activation of the individual CLEC end-users at the CLEC-capable SSP and
3 ISCP™. The CLEC's custom routing options are manually entered into various tables
4 that identify the appropriate routes from Verizon VA's end offices to the CLECs trunk
5 facilities. This provisioning information is accessed whenever a CLEC end-user places a
6 call. The AIN trigger provides the mechanism to access the ISCP™ database to
7 determine the appropriate routing for calls placed from a UNE-based customer's line.

8 **Q. IF VERIZON VA PROVIDES WORLDCOM WITH EXACTLY WHAT IT IS**
9 **ASKING FOR IN VERIZON VA SERVICE TERRITORIES, WHY IS THIS**
10 **ISSUE STILL IN DISPUTE?**

11 A. Verizon VA is not really sure what WorldCom is seeking beyond what it has formally
12 requested. As noted in our Direct Testimony filed on August 17, 2001, WorldCom has
13 proposed provisions for its interconnection agreement with Verizon VA that describe
14 how customized routing must be provided for OS/DA in Verizon service territories where
15 AIN architecture has not yet been deployed. *See* WorldCom's proposed interconnection
16 agreement § 7.2.2. Because AIN architecture has actually been deployed throughout
17 Verizon VA's service territory, there is no basis to include WorldCom's irrelevant
18 language. In fact, the only apparent basis for WorldCom's position is its hope to obtain
19 language that WorldCom would seek to import it to another jurisdiction where AIN
20 architecture has not been deployed. That is, frankly, an abuse of the arbitration process
21 that should not be countenanced. WorldCom should not be permitted to negotiate terms
22 and conditions in this proceeding that will have no application in Virginia.

1 **Q. IS VERIZON VA WILLING TO DEMONSTRATE TO WORLDCOM THAT ITS**
2 **OS/DA CUSTOMIZED ROUTING SERVICE IN VIRGINIA WILL ROUTE**
3 **WORLDCOM'S OS/DA TRAFFIC ASSOCIATED WITH ITS UNE-P TO THE**
4 **FG-D TRUNKS DESIGNATED BY WORLDCOM?**

5 A. Yes, Verizon VA is willing to test its AIN architecture to demonstrate to WorldCom that
6 this enhanced customized routing service is available in Virginia and will route OS/DA
7 calls via standard FGD signaling protocol. In fact, Verizon VA has sent WorldCom a
8 letter offering to engage in such testing.

9 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

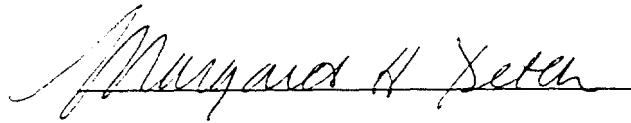
10 A. Yes.

11

DECLARATION OF MARGARET H. DETCH

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 5th day of September, 2001.

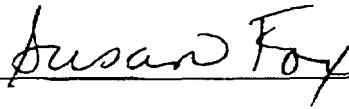
A handwritten signature in cursive script, reading "Margaret H. Detch", written over a horizontal line.

MARGARET H. DETCH

DECLARATION OF SUSAN FOX

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 5 day of September, 2001.


A handwritten signature in cursive script, reading "Susan Fox", is written over a horizontal line.

SUSAN FOX

DECLARATION OF NANCY M. GILLIGAN

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 5th day of September, 2001.

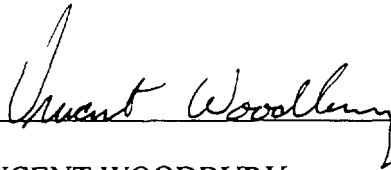
A handwritten signature in cursive script, reading "Nancy M. Gilligan", is written over a horizontal line.

NANCY M. GILLIGAN

DECLARATION OF VINCENT WOODBURY

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 5th day of September, 2001.

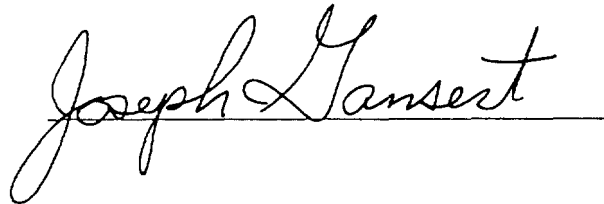


VINCENT WOODBURY

DECLARATION OF JOSEPH GANSERT

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

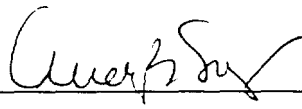
Executed this 5th day of September, 2001.

A handwritten signature in cursive script, reading "Joseph Gansert", is written over a horizontal line.

Alice B. Shocket

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 31 day of August, 2001.

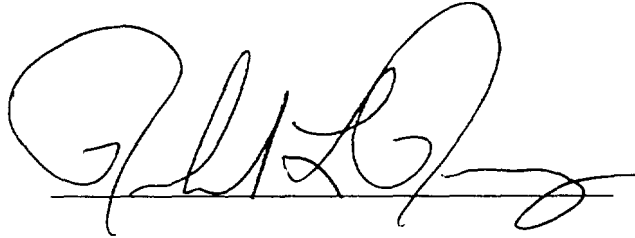


Alice B. Shocket

DECLARATION OF RICHARD L. ROUSEY

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this 29th day of August, 2001.

A handwritten signature in black ink, appearing to read 'R. L. Rousey', written over a horizontal line.

RICHARD L. ROUSEY

DECLARATION OF STEVEN J. GABRIELLI

I declare under penalty of perjury that I have reviewed the foregoing panel testimony and that those sections as to which I testified are true and correct.

Executed this _29th_ day of August, 2001.

A handwritten signature in cursive script, reading "Steven J. Gabrielli", written over a horizontal line.

{Steven J. Gabrielli}